Attachment 1. Region III UST Compliance Checklist

Facility ID Number 1656

Leak Detection Inspection

I. Ownership of Tank(s)

930 Port Street, Inc. dba Commercial Fuel Systems, Inc.
28102 Baileys Neck Road, Easton MD 21601

II. Location of Tank(s)

Easton Point
930 Port Street, Easton MD 21601
Number of Tanks at This Location: 4 (1 is compartmentalized)

III. Tank Information

Complete for each tank. If facility has more than 4 tanks, photocopy page and complete information for additional tanks.

	VR Numbers → 1 ~~Tank 1~~	2 ~~Tank 2~~	3 ~~Tank 3~~	4 ~~Tank 4~~	5 ~~Tank 4c~~
Tank presently in use (circle)					
If not, date last used	-	-	-	-	-
If emptied, verify 1" or less of product in tank	-	-	-	-	-
Month and Year Tank Installed	1/94	1/94	1/94	1/94	1/95
Material of Construction tank/pipe	sw cp steel / sw FRP	sw cp steel / sw FRP	sw cp steel / sw FRP	sw cp steel / sw FRP	sw cp steel / sw FRP
Capacity of Tank (in gallons)	4,000	4,000	8,000	8,000	8,000
Substance Stored	93 Octane (prem ethanol)	Off-Rd diesel	On-Rd Diesel	91 Octane (prem non-ethanol)	87 Octane (Regular)

IV.A. Release Detection For Tanks

Check the release detection method(s) used for each tank or N/A if none required.

Manual Tank Gauging (tanks under 1,000 gal.)					
Manual Tank Gauging and Tank Tightness Testing (tanks under 2,000 gal.)					
Tank Tightness Testing and Inventory Control					
Automatic Tank Gauging	✓	✓	✓	✓	✓
Vapor, Groundwater or Interstitial Monitoring					
Other approved method (SIR)					

IV.B. Release Detection For Piping

Check the release detection method(s) used for piping.

Check Pressurized (P) or Suction (S) Piping for each tank	P	P	P	P	P
Automatic Line Leak Detectors, and check one	✓	✓	✓	✓	✓
Vapor or Groundwater Monitoring					
Secondary Containment with Monitoring					
Line Tightness Testing	✓	✓	✓	✓	✓

I Melissa Toffel (print name) certify that I have inspected the above named facility on 6/13/18 (month/day/year)

Inspector's Signature: Melissa Toffel Date: 6/20/18

Facility ID Number 1656

Leak Detection for Piping

Pressurized Piping A method must be selected from each set. Where applicable indicate date of last test. If this facility has more than 4 tanks, please photocopy this page and complete information for all additional piping.

Set 1	1 ~~Tank 1~~	2 ~~Tank 2~~	3 ~~Tank 3~~	4 ~~Tank 4~~	5 ~~Tank 5~~
Automatic Flow Restrictor mLLDs	✓	✓	✓	✓	✓
Automatic Shut-off Device					
Continuous Alarm System					
and					
Set 2					
Annual Line Tightness Testing	✓	✓	✓	✓	✓
Interstitial Monitoring					
If Interstitial Monitoring, documentation of monthly monitoring is available					
Ground-Water or Vapor Monitoring					
If Ground-Water or Vapor Monitoring, documentation of monthly monitoring is available					
Other Approved Method (specify in comments section)					

Suction Piping. N/A Indicate date of most recent test.

Line Tightness Testing (required every 3 years)				
Secondary Containment with Interstitial Monitoring				
Ground-Water or Vapor Monitoring				
Other Approved Method (specify in comments section)				
No Leak Detection Required (must answer yes to all of the following questions)				
Operates at less than atmospheric pressure				
Has only one check valve, which is located directly under pump				
Slope of piping allows product to drain back into tank when suction released				
All above information on suction piping is verifiable				

On the back of this sheet, please sketch the site, noting all piping runs, tanks (including size and substances stored) and location of wells and their distance from tanks and piping.

Comments: Facility provided LLD & LTT documentation dated 3/23/18 for all 5 tanks all with Pass results. Facility also provided testing records dated 4/27/16, at that time 3 LLDs were tested (T2-P T4-P, T5-F) but 2 could not be (T1 & T3, "issues with pulling fuel"). LTT on 4/27/16 (T2, T4, T5 - Pass), T1 & T3 were not tested at that time.

Inspector's Signature: Melissa Toffel Date: 6/20/18

Facility ID Number 1656

Inventory Control and Tank Tightness Testing

Method of tank tightness testing: * See comments below

Address of tank tightness tester:

Please complete all information for each tank If this facility has more than 4 tanks, please photocopy this page and complete the information for all additional tanks.

	Tank 1	Tank 2	Tank 3	Tank 4
Date of last tank tightness test.				
Did tank pass test? Indicate yes or no. If no, specify in comments section below the status of the tank or what actions have been taken (e.g., has state been notified?)				
Documentation of deliveries and sales balances with daily measurements of liquid volume in tank are maintained and available.				
Overages or shortages are less than 1% + 130 gals of tank's flow-through volume.				
If no, which months were not?				

Please answer yes or no for each question

Owner/operator can explain inventory control methods and figures used and recorded.	Yes ☐	No ☐
Records include monthly water monitoring.	Yes ☐	No ☐
Tank inventory reconciled before and after fuel delivery.	Yes ☐	No ☐
Books are reconciled monthly.	Yes ☐	No ☐
Appropriate calibration chart is used for calculating volume.	Yes ☐	No ☐
Dispenser pumps are calibrated to within 6 cubic inches per five gallons.	Yes ☐	No ☐
The drop tube in the fill pipe extends to within one foot of tank bottom.	Yes ☐	No ☐
Owner can demonstrate consistency in dipsticking techniques.	Yes ☐	No ☐
The dipstick is long enough to reach the bottom of the tank.	Yes ☐	No ☐
The ends of the gauge stick are flat and not worn down.	Yes ☐	No ☐
The dipstick is marked legibly & the product level can be determined to the nearest 1/8th inch.	Yes ☐	No ☐
The tank has been tested within the year & has passed the tightness test (if necessary).	Yes ☐	No ☐
A third-party certification of the tank tightness test method is available.	Yes ☐	No ☐
Tank tester complied with all certification requirements.	Yes ☐	No ☐
Monitoring and testing are maintained and available for the past 12 months.	Yes ☐	No ☐

Comments: * MDE requires I.C., but this method is not being utilized as the primary method of tank release detection.

Inspector's Signature: Michael Topfel Date: 6/20/18

Facility ID Number 1654

Manual Tank Gauging - N/A

Manual tank gauging may be used as the sole method of leak detection only for tanks of 1,000 gal. or fewer or in combination with tank tightness testing for tanks of up to 2,000 gal.

Please indicate the number of the tank or tanks for which manual tank gauging is used as the main leak detection method (e.g., tanks 1 & 4): _____

Please answer yes or no for each question

Records show liquid level measurements are taken at beginning and end of period of at least ([Circle one] 36, 44, 58) hours during which no liquid is added to or removed from the tank.	Yes ☐	No ☐
Level measurements are based on average of two consecutive stick readings at both beginning and end of period.	Yes ☐	No ☐
Monthly average of variation between beginning and end measurements is less than standard shown below for corresponding size and dimensions of tank and waiting time.	Yes ☐	No ☐
Gauge stick is long enough to reach bottom of the tank. Ends of gauge stick are flat and not worn down.	Yes ☐	No ☐
Gauge stick is marked legibly and product level can be determined to the nearest one-eighth of an inch.	Yes ☐	No ☐
MTG is used as sole method of leak detection for tank.	Yes ☐	No ☐
MTG is used in conjunction with tank tightness testing.	Yes ☐	No ☐
Are all tanks for which MTG is used under 2,000 gallons in capacity?	Yes ☐	No ☐
Are monitoring records available for the last 12 month period?	Yes ☐	No ☐

Check One:	Nominal Tank Capacity (in gallons)	Tank Dimensions	Monthly Standard (in gallons)	Minimum Test Duration
( )	110-550	N/A	5	36 hours
( )	551 - 1,000*	N/A	7	36 hours
( )	1,000*	64" diameter x 73" length	4	44 hours
( )	1,000*	48" diameter x 128" length	6	58 hours
( )	1,001 - 2,000*	N/A	13	36 hours

* Manual tank gauging must be used in combination with tank tightness testing for tanks over 550 gal. and up to 2,000 gal.

Comments: _____

Inspector's Signature: Melissa Toffel Date: 6/20/18

Facility ID Number 1656

Automatic Tank Gauging

Manufacturer, name and model number of system: Veeder-Root TLS-350 Plus

Please answer yes or no for each question

Device documentation is available at site (e.g., manufacturer's brochures, owner's manual). Unknown	Yes ☐	No ☐
Device can measure height of product to nearest one-eighth of an inch.	Yes ☑	No ☐
Documentation shows that water in bottom of tank is checked monthly to nearest one-eighth of an inch. Unknown	Yes ☐	No ☐
Documentation is available that the ATG was in test mode a minimum of once a month.	Yes ☐	No ☑
Checked for presence of gauge in tanks.	Yes ☑	No ☐
Checked for presence of monitoring box and evidence that device is working (i.e., device is equipped with roll of paper for results documentation).	Yes ☑	No ☐
Owner/operator has documentation on file verifying method meets minimum performance standards of .20 gph with probability of detection of 95% and probability of false alarm of 5% for automatic tank gauging (e.g., results sheets under EPA's "Standard Test Procedures for Evaluating Leak Detection Methods").	Yes ☑	No ☐
Checked documentation that system was installed, calibrated, and maintained* according to manufacturer's instructions.	Yes ☑	No ☐
Maintenance records are available upon request.	Yes ☑	No ☐
Monthly testing records are available for the past 12 months.	Yes ☐	No ☑
Daily monitoring records are available for the past 12 months (if applicable).	Yes ☐	No ☑

Comments: * Tank Monitoring System Certification dated 3/23/18 provided by the facility.
.2 gph testing being conducted. Only records for 5/18 & 6/18 provided (see attachment for results).

Inspector's Signature: Melissa Toffel Date: 6/20/18

Facility ID Number 1656

Spill/Overfill Prevention

	Tank 1 & 2	Tank 2	Tank 3	Tank 4
Are all tank transfers less than 25 gallons?	Yes ☐ No ☑	Yes ☐ No ☑	Yes ☐ No ☑	Yes ☐ No ☑
Spill Prevention				
Is there a spill bucket (at least 5 gallons) or another device that will prevent release of product to the environment (such as a dry disconnect coupling)?	Yes ☑ No ☐	Yes ☑ No ☐	Yes ☑ No ☐	Yes ☑ No ☐
Overfill Prevention *				
What device is used to prevent tank from being overfilled?				
Ball float valve	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Butterfly valve (in fill pipe)	Yes ☐ No ☑	Yes ☐ No ☑	Yes ☐ No ☑	Yes ☐ No ☑
Automatic alarm monitoring is used	Yes ☐ No ☑	Yes ☐ No ☑	Yes ☐ No ☑	Yes ☐ No ☑
Other alarm system	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐

DOES THE FACILITY HAVE A FINANCIAL ASSURANCE MECHANISM? YES ✓ NO ___ (PROVIDE COMMENTS AS TO COMPLIANCE STATUS FOR 40 C.F.R. PART 280 SUBPART H.) **

Cathodic Protection ***

	Tank 1	Tank 2	Tank 3	Tank 4
Sacrificial Anode System				
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
The last two test results are available. (Tests are required every three years.)	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
Impressed Current				
Rectifier is on 24 hours a day? Unknown	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐	Yes ☐ No ☐
The last two test results are available? (Tests are required every 60 days.)	Yes ☑ No ☐	Yes ☑ No ☐	Yes ☑ No ☐	Yes ☑ No ☐
Test results show a negative voltage of at least 0.85 Volts (using the tank and a copper/copper sulfate cell)?	Yes ☑ No ☐	Yes ☑ No ☐	Yes ☑ No ☐	Yes ☑ No ☐

Comments: * Overfill could not be verified in the field.

** Policy thru Colony Insurance Co., good from 9/20/17 - 9/20/18

*** CP testing on 3/8/18 on Flex connectors only - all PASS
CP testing on 2/1/18 on the tanks - all PASS
CP testing on 4/17/16 on Flex connectors ~~only~~ AND tanks - all PASS

Inspector's Signature: Melissa Boffel Date: 4/20/18

Site Sketch/Photo Log

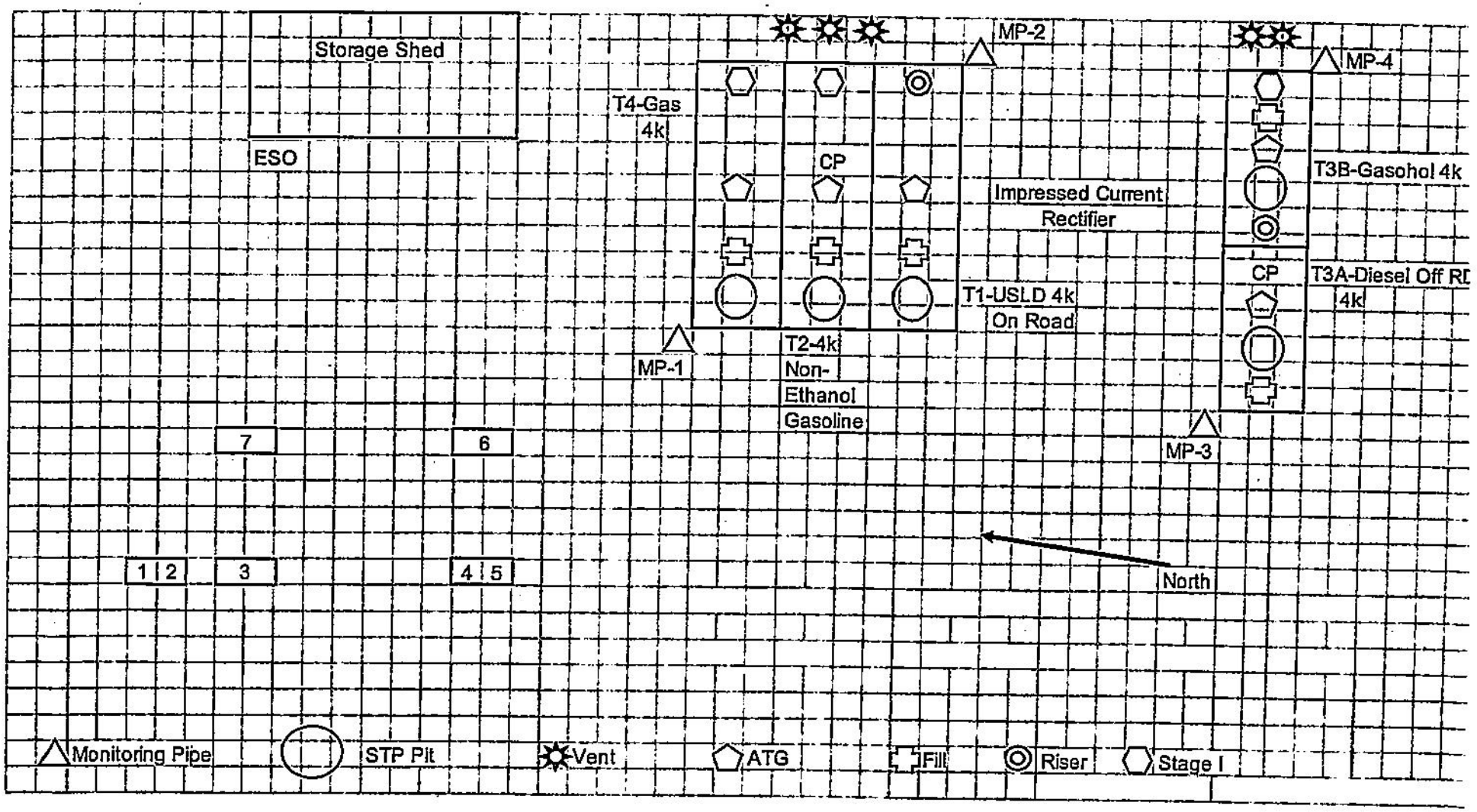
See attached site diagram provided by the facility.

MCT
6/20/18

Commercial Fuel Systems Inc.
930 Port Street
Easton, MD 21601

Clean Fuels Associates, Inc.
Kyle Nelson

MDE Facility 1656



Port Street SS-2018.xls
Site Drawing

2/28/18 6:27 PM